

DC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RECEIVED EAA

AUG 03 2015  
8-3-15  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Jesse J. Crum

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 15c 2522  
(To be supplied by the Clerk of this Court)

Tom Dart

Lt Tucker

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

\_\_\_\_\_

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

\_\_\_\_\_

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Jesse J. CRUM
- B. List all aliases: N/A
- C. Prisoner identification number: M52223
- D. Place of present confinement: SHAWNEE Correctional
- E. Address: 6665 State Route, 146 East Vienna, IL 62995

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: TOM DART  
Title: SHERIFF  
Place of Employment: COOK COUNTY Jail
- B. Defendant: Lieutenant Tucker  
Title: SHERIFF  
Place of Employment: COOK County
- C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Jesse J. Crum - v -  
TOM DART 15C2522
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A  
Jesse J. Crum
- D. List all defendants: TOM DART  
Lieutenant Tucker
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT OF ILLINOIS
- F. Name of judge to whom case was assigned: CHARLES R. NORGLE SR.
- G. Basic claim made: INFECTIONS Disease, ALLERGIES - BREATHING  
ECT,
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING - AMENDED
- I. Approximate date of disposition: 3-31-15

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I came to Cook County Jail on 6/29/14. I were placed in Div 2  
D-4 I had beginning the needs to treat my condition. I started  
to work in the central kitchen. I had three type position to  
perform every day. I needed activity movement at the time.  
I stay focus on to be able to treat my Disabability of the  
inconvenience distress troubles. I had started working  
morning through to evening 6:00am - 1:30pm. I had bad  
Health problem to solve them and correct them, this is  
why the reason am doing here. To strengthen my behavior.  
I made two dollars aday. it was'nt the moneys. My continueing  
to preventing me from having another break down. I continue  
to perform the competion to stay focus. There was two  
Dorms I Live in the back Dorm. Both Dorms included about  
Seven hundred inmates. Do to the after noon 2:00 pm  
I would take me a shower. It would be when 5/0  
Changing there shift. The Bath Room would be left  
in a mess doing the day. Because there are 280 men taking  
Showers. I would taking a shower when it would be unsanitary.

The crowded inmate activity had caused a mess in the Bath room.  
I had brought this to the attention of the Sheriff Officers.  
This was happen with the other inmate they also would Complaint.  
Between 7/29/14 I had Received Rashes on Both of my legs  
after taking a shower. I was Shock to see being Surrounded  
by fungus. I had BROKE out with Contusion causes all over  
my body. It continue to spread it bother me at night couldn't  
Sleep from itching and scartching. At night I would notified  
the S/O that I wait all night until shift change to see the  
Doctor. The infection had been developed into more need medical  
examine at the time. Be that I had Brought issue with me  
without explaining. But wasn't plan being catching Contusion  
to my body. It were mostly emotion distress upon me. The  
Doctor at Cook County medical Health service. They do what  
Seemed to be at times, not what should had been Done. They  
Should have Request to notified the enironment control to  
inspect test for disease. ARE Request Respoisble attention  
to whom in Charge beable answer to does Living Condition  
that is provide there. I would try everything to get to  
see the Doctor. After two week I meet Lieutenant Tucker  
I Spoke about the unsanitary conditions. How I were being  
Complaint Bath room and the Contusion how I Received it.

M52223

2-C-18

Regarding the Defendant who was John Doe in my Complaint. He was the Lieutenant Tucker. He was The Sheriff that could get inmate attention and maintain control over both entirety connected dorms I was going to the dorms and there I was approached by the Lieutenant. I requested from him some emergency help. He answered me and said what the problem, I replied back and said that a contusion is causing me to scratch off my legs and want to stop bleeding. He allowed me to be taken over by a Sheriff officer to the medical health service. I got to see the doctor I said to him. I really do need some antibiotic for this infection being bothering me over two months. And the Hydrocortisone anti-itch cream has not worked. I was just trying to be careless of asking the doctor. I question myself and answer I suggest that in this place not notices any signs stated this is warning Dangerous and Hazardous. But the matters of facts I continue taking showers after work. All the complaint being by inmate they decided to move. They relocated inmate over to Div-4 the women. That included both dorms of Div-2. There was construction repairs to be made. The roofing, ventilation, duct system, plumbing system, ceiling, walls and floors painting provided through the building. The inmates of seven hundred was divided in two to cell. That last about one month in August. Beginning to return back I then was sent to the opposite side. I continue getting medical from the medical health service.

ID M52223  
2-C-18

I was still there on Div-2 until the night I took sick. I had ate a piece of chicken and then inform the Sheriff officer. He pick up the phone and called for Sheriff officer assistance. The Sheriff walked me over to CERMAK Hospital. Where they had examine me for Stomach symptoms. I then developed a loose bowel movement diarrhea flood that causes a mess with the nurses. After I being evaluate they put on a gurney and waited until the ambulance came to take me to Stroger Hospital for medical Reason.

During the stay I took sick on my stomach. I started to burning up inside my stomach and which I kept vomiteding. It was late in the evening about 5:30pm. The Doctor kept montitored me until I had stopped vomiteding. And I had ASK the Doctor to take a Look at my Legs. He did Look and ask me do I use Drugs. I said no sir. I Reply that I haven't smoke a Cigarette over 35 years. I felt very unpleasant after that Statement being maded, I had been treat and recommended to take prescribed medications. I was Relief to Leave go Back to Cook County Jail. I was sent to the Receiving cells. I then was sent to a medical unit. I been put on a Dorm without very Receive my propertys was very found there at the old Div 2 sent 11 months.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Living Provided by Contusion that presented his Legs.  
Bruises due to unsanitary conditions cause him  
6 months damages of neglect reason. For unclean  
Environment with caring and Living in Dangerous and  
Hazardous Lead to having developed Contusion, Stress abuse.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 27 day of July, 20 15

Jesse James Crum  
(Signature of plaintiff or plaintiffs)

Jesse James Crum  
(Print name)

M52223  
(I.D. Number)

10046 SOUTH WALLACE ST.

CHICAGO ILLINOIS 60628  
(Address)